

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **CAROL MARIE BROWN-PAPP**, aka : Chapter 13
Carol Marie Brown, : Case No. **5:19-bk-03609**
Debtor :

NEWREZ, LLC DBA SHELLPOINT MORTGAGE, :
as servicer for U.S. Bank, N.A., not in its individual :
capacity but solely as Trustee of NRZ Pass- :
Through Trust X, :
Movant(s), : **Motion for**
v. : **Relief from Stay**
CAROL MARIE BROWN-PAPP and :
Charles J. DeHart, III, Chapter 13 Trustee, :
Respondent(s), :

ANSWER TO MOTION OF NEWREZ FOR RELIEF FROM STAY

AND NOW COMES Debtor(s) **CAROL MARIE BROWN-PAPP**, by and through their attorneys,
FISHER CHRISTMAN, and in Answer to the Motion of **NEWREZ** for Relief from Stay aver:

1-2. Admitted.

3. Denied. Upon information and belief, the Trustee is appointed by the Office of United
States Trustee.

4. Denied to the extent the document(s) referenced do(es) not speak for itself(themselves.)

5. Admitted.

6. Admitted in part and Denied in part. While Debtor reasonably believes the amount due
is less, postpetition mortgage arrears exist due to recoupment of disability insurance benefits that will
cease in January of 2021, with disability insurance payments of approximately \$700 resuming in
February of 2021. Debtor believes that the payments amounts indicated in the postpetition payments
history filed with the Motion and in the two most recent Notice of Mortgage Payment Changes were
increased due to escrow deficits that were the result of nonpayment, and that a cure of arrears would
decrease the ongoing payments significantly, retroactive to June 1, 2020.

7. Denied. See response to paragraph 6, above.

8. Denied to the extent the averments of paragraph 8 constitute other than a statement or conclusion of law or misplaced request for relief.

9. Denied to the extent the averments of paragraph 9 constitute other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Debtor **CAROL MARIE BROWN-PAPP** respectfully prays this Honorable Court for an Order than the Motion of **NEWREZ** for Relief from Stay be Denied, or, in the alternative, that the stay be conditioned on resumption of regular mortgage payments by December 15, 2020, with a cure of postpetition arrears beginning with the payment due in February of 2021, or cure via a Modified Chapter 13 Plan, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER & CHRISTMAN

By: /s/ J. Zac Christman
J. Zac Christman, Esquire
Attorney for Debtor(s)
530 Main Street
Stroudsburg, PA 18360
(570) 234-3960, fax: (570) 234-3965
zac@fisherchristman.com